

Plaintiffs' Exhibit 2

ETF COLLECTION SUMMARY

The parties engaged Setec Investigations to perform some aspects of the collection, as well as data filtering, under the direction of Heyl Royster.

EMAIL ACCOUNTS

- Martin & Schlafly –
 - Primary Accounts:
 - edmartin1791@gmail.com
 - Entire account collected in March 2018
 - Estimated size: ~200 GB
 - johnschlafly@gmail.com
 - Entire account collected in March 2018
 - Estimated size: 35 GB
 - Email count: 313,296 messages
 - Search terms
 - Ed Martin Account:
 - Martin account initially filtered by an initial set of terms with a date restriction of 1/1/2015 through 12/31/2017. [\[Ed's Email - Search Term List - Final \(sent 3-23-18\) - To Setec.xlsx\]](#)
 - Martin account then filtered by a set of revised terms. [\[Martin and Schlafly - Final Search Terms \(3 29 18\).XLSX\]](#)
 - Then adjustments to the following two terms were made:
 - 1. Prior: "[okrnewalive.com](#) (1/1/2015 --> 12/31/2017)"
 - Now: "[okrncw@live.com](#) (1/1/2015 --> 12/31/2017)"
 - 2. Prior: "James OR Sanders (1/1/2015 --> 12/31/2017)"
 - Now: "**Sanders (1/1/2015 --> 12/31/2017)"**
 - Schlafly account filtered by an initial set of terms. [\[FINAL - Schlafly - Search Terms - gmail \(sent 3 30 18\).XLSX\]](#)
 - Both accounts then further filtered by a set of updated terms. [\[Culling Criteria.xlsx\]](#)
 - Both accounts then further filtered by a set of final terms. [\[Culling Criteria as of 4-6-18.xlsx\]](#)

- Other Accounts:
 - john@pseagles.com
 - Estimated size: 4 MB
 - Email count: 44 messages
- Other Custodians –
 - Bruce Schlafly -
 - Account Details:
 - jmschlafly@yahoo.com
 - bschlafly@yahoo.com
 - bschlaflymd@gmail.com
 - All accounts were collected with a date restriction of 1/1/2015 through 12/31/2017.
 - The accounts were filtered by a set of search terms. [\[Bruce Schlafly - Search Terms Revised \(1\).xlsx\]](#)

ADDITIONAL GOOGLE DATA

- Google Drive:
 - Files associated with edmartin1791@gmail.com were collected.
 - Estimated size: 11.3 GB
 - File count: 2,547 files
 - Files associated with johnschlafly@gmail.com were collected.
 - Estimated size: 1.89 GB
 - File count: 213 files
- Google Hangouts:
 - Chat data associated with edmartin1791@gmail.com was collected.
 - Chat data associated with johnschlafly@gmail.com was collected.

COMPUTER IMAGES

Avansic was engaged to image a number of devices:

- HP Laptop (Schlafly)
- Samsung Flip phone (Schlafly)
- HP Pavilion (Martin)
- Macbook Air (Martin)
- iPhone 8 (Martin)

(See Chain of Custody document here [MartinSchlaflyCOC.PDF](#).)

The images were then sent to Setec for indexing and filtering.

Setec applied a set of search terms to the images with a date range of 1/1/2015 through 12/31/2017 [[SearchTermReport-20180508215317-4.pdf](#)].